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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LEZLIE J. GUNN, an individual,

Plaintiff,

v.

CHRISTINE E. DRAGE, an individual;
and DOES 1-10, inclusive,

Defendants.

Case No.: 2:19-cv-02102-JCM-EJY

**ORDER ON MOTION FOR JUDGMENT
DEBTOR EXAMINATION OF LEZLIE
GUNN**

DATE: February 13, 2023

TIME: 10:30 a.m.

The Court, having reviewed the Motion for Judgment Debtor Examination of Lezlie Gunn (“Gunn”), submitted by the Defendant, Christine Drage (“Drage”), and good cause appearing:

IT IS HEREBY ORDERED, that Lezlie Gunn shall appear at the office of Brownstein Hyatt Farber Schreck, LLP, located at 100 North City Parkway, Suite 1600, Las Vegas, Nevada 89106 on February 13, 2023, at 10:30 a.m. for a judgment debtor examination regarding Gunn’s property and assets.

IT IS FURTHER ORDERED, that Lezlie Gunn shall produce to Drage’s counsel at 100 North City Parkway, Suite 1600, Las Vegas, Nevada 89106, one week prior to the examination, the following documents:

1. Any and all documents sufficient to identify the name and address of any person, business or employer who has paid or provided revenue to Gunn during the relevant time period;

2. Articles of incorporation or organization, partnership and/or joint venture agreements, charters, bylaws, corporate minute books, and other documents relating to the formation of any business entity in which Gunn owned an interest, either directly or indirectly, or served as an officer or director, during the relevant time period.

3. Any and all documents identifying all friends, family members, partners, or business associates with whom Gunn engaged in any transaction during the relevant time period.

4. Any and all documents evidencing all sources of income, revenue, or remuneration of any kind, including payments for goods and services, interest income, operating income, payments on accounts receivable, commissions, agency fees, loan repayments, rents, royalties, license fees, dividends, distributions, payments relating to sales of assets, equipment, or inventory, payments on contracts, or any other payment or remuneration Gunn received in the relevant time period.

5. Copies of state, federal, and foreign income tax returns, and all related forms and schedules (including all amended returns, forms, and schedules) filed during or relating to the relevant time period.

6. Copies of paystubs, W-2s, 1099s, K-1s, and other tax reporting forms reflecting any income, salary, wages, commissions, distributions, or other compensation or remuneration Gunn received, whether as an employee, partner, member, shareholder, independent contractor, or otherwise, during the relevant time period.

7. Financial statements, balance sheets, income statements, cash flow statements, and loan applications prepared or submitted by Gunn or on Gunn's behalf during the relevant time period.

8. Any and all documents relating to any debts Gunn first incurred during the relevant time period.

9. Any and all documents sufficient to identify Gunn's interest in any real property Gunn currently owns, holds, or claims any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period.

10. Copies of all bank statements or other account statements for any account which Gunn currently owns, holds, or claims any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period, at any bank, brokerage, investment firm, or other financial institution.

11. Any and all documents sufficient to identify all vehicles, aircrafts, boats, or other water vessels Gunn currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period.

12. Any and all documents sufficient to identify any and all other tangible property with a value over \$1,000.00 which Gunn currently owns, holds, or claims any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period.

13. Any and all documents relating to or evidencing any other party's interest in or claim to any of Gunn's tangible personal property, including all debts or liabilities secured by, or liens, security interests, or other encumbrances in, on, or against the property.

14. Any and all documents sufficient to identify any corporation, subsidiary, limited liability company, trust, partnership, or other business entity of any kind or nature in which Gunn currently owns, holds, or claims any type of interest in, directly or indirectly, in whole or in part, or in which Gunn owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period.

15. Any and all documents relating to any and all intangible property with a value over \$1,000.00 which Gunn currently owns, holds, or claims any type of interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part, during the relevant time period., including but not limited to any and all:

(a) Contracts.

(b) Security agreements.

(c) Stocks, bonds, or other evidence of ownership, equity, or investment in any business entity.

(d) Patents, copyrights, trademarks, or other evidence of intellectual property rights.

(e) Accounts receivable.

(f) Notes receivable.

(g) Corporate goodwill.

(h) Research and development.

(i) Retirement, pension, 401(k), and IRA accounts.

(j) Annuities.

16. Any and all documents relating to or evidencing any other party's interest in or claim to any of Gunn's intangible personal property, including all debts or liabilities secured by, or liens, security interests, or other encumbrances in, on, or against the property.

17. Any and all documents relating to policies of insurance Gunn currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or were covered under during the relevant time period, including but not limited to any and all policies, contracts, notices, amendments, modifications, and renewals of any such policy.

18. If Gunn claims that any of Gunn's revenue, income, or assets are exempt from collection, all documents evidencing the basis for such exemption.

19. Any and all documents relating to any and all debts or liabilities owed to Gunn by third parties, including, but not limited to, all claims, causes of action, lawsuits, judgments, or liens Gunn now have or had at any time during the relevant time period against any third party.

20. Any and all documents relating to or evidencing any third party's possession, ownership, or control of any of Gunn's assets, in whole or in part, including but not limited to:

(a) Contractual agreements, including all drafts and markups.

(b) Certificates of title or deeds.

(c) Publicly filed documents relating to the third party's possession or ownership interest.

(d) Correspondence, internal memoranda, notes, or other records relating to the third party's possession or ownership interest.

21. Any and all documents relating to or evidencing any transaction in which Gunn transferred any interest in any of Gunn's assets over the value of \$1000.00, in whole or in part, to any transferee during the relevant time period, including but not limited to:

- (a) Contractual agreements, including all drafts and markups.
- (b) Certificates of title or deeds.
- (c) Publicly filed documents relating to the transaction.
- (d) Correspondence, internal memoranda, notes, or other records relating to the transaction.

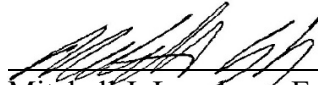
No timely response to the Motion having been received,

IT IS SO ORDERED this 1st day of February, 2023.


UNITED STATES MAGISTRATE JUDGE

Submitted by:

BROWNSTEIN HYATT FARBER SCHRECK, LLP



Mitchell J. Langberg, Esq.
100 North City Parkway, Suite 1600
Las Vegas, NV 89106-4614

Attorneys for Christine E. Drage

Dated: January 17, 2023